

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

L.E., by his next friend and parents,)
SHELLEY ESQUIVEL and)
MARIO ESQUIVEL,)
)
Plaintiff,)
)
v.)
)
BILL LEE, in his official capacity as)
Governor of Tennessee, et al.)
)
Defendants.)

No. 3:21-cv-00835

Chief Judge Crenshaw
Magistrate Judge Newbern

MOTION FOR DISCOVERY CONFERENCE

Counsel for Plaintiff have repeatedly made good faith attempts work with counsel for Defendants Lee, Schwinn, Morrison, Tennessee State Board of Education, and the individual members of the Tennessee State Board of Education in order to elicit responses to Plaintiff's First Set of Requests for Production and Plaintiff's First Set of Interrogatories (Defendant Lee only), served February 17, 2022, but to no avail. Plaintiff has received no response or production from Defendant Lee and only three documents from the other Defendants.

Plaintiff therefore respectfully requests a discovery dispute telephone conference, per the Case Management Order in this case, Dkt. No. 22, at the Court's earliest availability. Plaintiff's counsel have informed Defendants' counsel of their intention to request a discovery dispute telephone conference.

Dated: May 27, 2022

Respectfully submitted,

/s/ Stella Yarbrough

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*Attorney for Plaintiff L.E., by his next friends
and parents, Shelley Esquivel and Mario
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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2022, a true and correct copy of the foregoing Joint Motion for Protective Order was served on the Tennessee Attorney General's Office, counsel for all Defendants, via the Court's ECF/CM system.

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/s/ Stella Yarbrough
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